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10 CORPORATION

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 NEELAM SANDHU, an individual,

14 Plaintiff,

15 vs.

16 BLACKBERRY CORPORATION, a
17 Delaware Corporation,

18 Defendant.

19 **Case No.: 3:24-cv-02002-SK**

20 **DECLARATION OF LAUREN N. BECK IN
21 SUPPORT OF DEFENDANT
BLACKBERRY CORPORATION'S
MOTION FOR SUMMARY JUDGMENT**

22 *Filed concurrently with BlackBerry's Motion
and Notice of Motion, the Declarations of J.
Bramhill and F. Deziel, and [Proposed]
Order*

23 Hearing Date: January 26, 2026
24 Time: 9:30 AM
25 Place: Courtroom C
26 Judge: Hon. Sallie Kim

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2 **DECLARATION OF LAUREN N. BECK**

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4 I, Lauren N. Beck, hereby declare:

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6 1. I am admitted to practice law in the State of California and before this Court. I am
7 an attorney at Munger, Tolles & Olson LLP, and represent Defendant BlackBerry Corporation in
8 this action. I submit this declaration in support of Defendant BlackBerry Corporation's Motion
9 for Summary Judgment. The contents of this declaration are based on my personal knowledge,
10 including my personal knowledge of the documents cited herein. The facts set forth herein are
11 within my personal knowledge and, if called as a witness, I could and would competently testify
12 to them

13 2. Attached as **Exhibit 1** is a true and correct copy of excerpts from transcript of the
14 deposition of John Chen, taken in this matter on August 5, 2025.

15 3. Attached as **Exhibit 2** is a true and correct copy of a March 17, 2021
16 memorandum from Richard J. Curiale to John Chen regarding "Investigation Report Involving
17 Various Issues Causing 'Friction' Between the Sales Team and the Elite 30 Team," produced in
18 this litigation as DOE000186.

19 4. Attached as **Exhibit 3** is a true and correct copy of excerpts from the transcript of
20 the deposition of Neelam Sandhu, taken in this matter on August 22, 2025.

21 5. Attached as **Exhibit 4** is a true and correct copy of a July 19, 2022 email Nita
22 While-Ivy to Neelam Sandu with subject "Confidential Matter," produced in this litigation as
23 BB13-00002445.

24 6. Attached as **Exhibit 5** is a true and correct copy of a July 18, 2024 email from
25 Hugh Jones with subject "BlackBerry OBR and Corrected Organization Chart," produced in this
26 litigation as BB13-00002384.

27 7. Attached as **Exhibit 6** is a true and correct copy of an August 26, 2022 email from
28 Neelam Sandhu to Jennifer Bramhill with subject "Review of Organizational Chart Inaccuracy,"
produced in this litigation as BB13-00004042.

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2 8. Attached as **Exhibit 7** is a true and correct copy of an July 19, 2025 email from
3 Neelam Sandhu to John Giammateo with subject “Org Matter,” produced in this litigation as
4 BB13-00002456.

5 9. Attached as **Exhibit 8** is a true and correct copy of an February 6, 2023 email from
6 Neelam Sandhu to Nita White-Ivy with subject “JJG,” produced in this litigation as BB13-
7 00004373.

8 10. Attached as **Exhibit 9** is a true and correct copy of Plaintiff’s Second Amended
9 Responses to Defendant Blackberry Corporation’s Interrogatories Set One, served in this
10 litigation by Plaintiff Neelam Sandhu and dated July 24, 2025.

11 11. Attached as **Exhibit 10** is a true and correct copy of a February 10, 2023
12 memorandum from Richard Curiale and Monical Lee to John Chen and Nita White-Ivy regarding
13 “Investigation Report re: Issues Raised by Neelam Sandhu,” produced in this litigation as BB13-
14 00019395.

15 12. Attached as **Exhibit 11** is a true and correct copy of a February 13, 2023 email
16 from Richard Curiale to Neelam Sandhu with subject “Lunch,” produced in this litigation as
17 BB13-00011766.

18 13. Attached as **Exhibit 12** is a true and correct copy of a March 20, 2023 email from
19 Richard Curiale to John Chen, with subject “I talked to Neelam” produced in this litigation as
20 BB13-00012834.

21 14. Attached as **Exhibit 13** is a true and correct copy of a March 8, 2025 email from
22 Richard Curiale to John Chen with subject “Neelam just called,” produced in this litigation as
23 BB13-00012829.

24 15. Attached as **Exhibit 14** is a true and correct copy of a June 1, 2023 letter sent from
25 Nita White-Ivy to Neelam Sandhu, produced in this litigation as DOE000098.

26 16. Attached as **Exhibit 15** is a true and correct copy of a September 1, 2023 letter
27 from John Chen to Neelam Sandhu, produced in this litigation as BB13-00005014.

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2 17. Attached as **Exhibit 16** is a true and correct copy of a May 1, 2023 press release
3 entitled, “BlackBerry Announces Commencement of Review of Portfolio and Business
4 Configuration,” produced in this litigation as BB13-00022511.

5 18. Attached as **Exhibit 17** is a true and correct copy of a October 4, 2023 press
6 release entitled, “BlackBerry Provides Project Imperium Update and Announces Intention to
7 Separate Business Unites,” produced in this litigation as BB13-00022508.

8 19. Attached as **Exhibit 18** is a true and correct copy of a October 30, 2023 press
9 release entitled, “BlackBerry Announces John Chen to Retire as Executive Chair and CEO,”
10 produced in this litigation as BB13-00022503.

11 20. Attached as **Exhibit 19** is a true and correct copy of a complaint submitted to
12 BlackBerry, dated October 26, 2023 and produced in this litigation as BB13-00016005.

13 21. Attached as **Exhibit 20** is a true and correct copy of excerpts from transcript of the
14 deposition of Richard Lynch, taken in this matter on June 5, 2025.

15 22. Attached as **Exhibit 21** is a true and correct copy of an October 28, 2023 email
16 from Jennifer Bramhill to Phil Kurtz, with subject “Confidential – Response,” produced in this
17 litigation as BB13-00016979.

18 23. Attached as **Exhibit 22** is a true and correct copy of notes written by Richard
19 Lynch for a November 6, 2023 meeting with BlackBerry’s executive leadership team, produced
20 in this litigation as BB13-00017578.

21 24. Attached as **Exhibit 23** is a true and correct copy of a January 20, 2022 email from
22 Neelam Sandhu to John Giamatteo, subject “RE: BB Cyber Security Weekly Leadership Team
23 Call,” produced in this litigation as BB13-00007161.

24 25. Attached as **Exhibit 24** is a true and correct copy of a November 6, 2023
25 document, entitled “Short Message Report,” produced in this litigation as BB13-00017752.

26 26. Attached as **Exhibit 25** is a true and correct copy of a November 13, 2023
27 memorandum from Christian Hill to File regarding “BlackBerry Investigation – Interview of
28 Neelam Sandhu,” produced in this litigation as MoFo-00000073.

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2 27. Attached as **Exhibit 26** is a true and correct copy of a November 22, 2023
3 memorandum from Morrison & Foerster to Lisa Disbrow and Phil Kurtz regarding “Privileged &
4 Confidential BlackBerry Workplace Investigation Report,” produced in this litigation as
5 BB13-00019104.

6 28. Attached as **Exhibit 27** is a true and correct copy of a November 27, 2023 email
7 from Christin Hill to Richard Lynch and others, subject “Confidential Report” and its attachment,
8 produced in this litigation as BB13-00018650 and BB13-00018651.

9 29. Attached as **Exhibit 28** is a true and correct copy of a November 16, 2023 email
10 from Neelam Sandhu to Christin Hill, subject “Re: Follow Up RE: Confidential Meeting” and its
11 attachments, produced in this litigation as BB13-00018146.

12 30. Attached as **Exhibit 29** is a true and correct copy of a November 7, 2023 email
13 from Neelam Sandhu to Christin Hill, subject “Follow Up RE: Confidential Meeting” and its
14 attachments, produced in this litigation as BB13-00017812.

15 31. Attached as **Exhibit 30** is a true and correct copy of excerpts from transcript of the
16 deposition of John Giamatteo, taken in this matter on August 28, 2025.

17 32. Attached as **Exhibit 31** is a true and correct copy of excerpts from transcript of the
18 deposition of Phil Kurtz, taken in this matter on July 29, 2025.

19 33. Attached as **Exhibit 32** is a true and correct copy of a November 16, 2025 email
20 from Neelam Sandhu to Dick Lynch, subject “FW: Follow Up RE: Confidential Meeting,”
21 produced in this litigation as BB13-00018204.

22 34. Attached as **Exhibit 33** is a true and correct copy of a November 29, 2023 email
23 from Phil Kurtz to Dick Lynch, subject: “STRICTLY CONFIDENTIAL: BlackBerry
24 Preliminary Severance Calculations,” produced in this litigation as BB13-00018714.

25 35. Attached as **Exhibit 34** is a true and correct copy of a December 7, 2023 email
26 sent from Dick Lunch to Prem Watsa and others, subject “CEO and related item status,” produced
27 in this litigation as BB13-00004693.

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2 36. Attached as **Exhibit 35** is a true and correct copy of a December 2, 2023 email
3 from Phil Kurtz to Dick Lynch, subject “RE: Status update” and its attachments, produced in this
4 litigation as BB13-00018742.

5 37. Attached as **Exhibit 36** is a true and correct copy of a December 8, 2023 email
6 from Dick Lynch to Neelam Sandhu, subject “Resignation option,” produced in this litigation as
7 BB13-00004714.

8 38. Attached as **Exhibit 37** is a true and correct copy of a December 10, 2023 email
9 from Dick Lynch to Shakyra Adorno and others, subject “Personnel announcement for the
10 Marketing and Elite Teams,” produced in this litigation as BB13-00018972.

11 39. Attached as **Exhibit 38** is a true and correct copy of a February 13, 2023 email
12 from Richard Curiale to John Chen, subject “Fwd: Lunch,” produced in this litigation as BB13-
13 00011767.

14 40. Attached as **Exhibit 39** is a true and correct copy of a December 11, 2023 press
15 release entitled, “BlackBerry Appoints John Giamatteo as CEO,” produced in this litigation as
16 BB13-00022505.

17 41. Attached as **Exhibit 40** is a true and correct copy of a February 3, 2023 email from
18 Richard Curiale to Neelam Sandhu, subject “Re: Possible compromise,” produced in this
19 litigation as BB13-00012142.

20 42. Attached as **Exhibit 41** is a true and correct copy of a April 20, 2023 email from
21 Neelam Sandhu to John Chen and others, subject “RE: MAP update section 17.0,” produced in
22 this litigation as BB13-00006406.

23 43. Attached as **Exhibit 42** is a true and correct copy of excerpts from transcript of the
24 deposition of Marjorie Dickman, taken in this matter on September 11, 2025.

25 44. Attached as **Exhibit 43** is a true and correct copy of a February 12, 2024 press
26 release entitled, “BlackBerry Provides Update on Progress in Separation of Divisions and Path to
27 Profitability,” produced in this litigation as BB13-00022362.

28 45. Attached as **Exhibit 44** is a true and correct copy of excerpts from transcript of the
deposition of Colleen McMillan, taken in this matter on February 24, 2025.

46. Attached as **Exhibit 45** is a true and correct copy of excerpts from transcript of the deposition of Erin Ransom, taken in this matter on February 26, 2025.

47. Attached as **Exhibit 46** is a true and correct copy of excerpts from transcript of the deposition of Mary Slimmon, taken in this matter on April 10, 2025.

48. Attached as **Exhibit 47** is a true and correct copy of excerpts from transcript of the deposition of Sarah Tatsis, taken in this matter on September 2, 2025.

49. Attached as **Exhibit 48** is a true and correct copy of handwritten notes identified in the deposition of Richard Lynch as Exhibit 34, and produced in this litigation as BB13-00019036.

50. Attached as **Exhibit 49** is a true and correct copy of excerpts from transcript of the deposition of Jennifer Bramhill, taken in this matter on September 19, 2025.

Executed on this 10th day of December, 2025, at Los Angeles, California.

/s/ Lauren N. Beck

Lauren N. Beck

Counsel for Defendant BlackBerry Corporation